

**FOOD STAMP PROGRAM
REQUEST FOR REGULATION INTERPRETATION**

INSTRUCTIONS: Complete items 1 - 10 on the form. Use a separate form for each policy interpretation request. Retain a copy of the FS 24 for your records. For counties asking for policy interpretations, submit the question directly to a FRAT representative via e-mail. For other organizations (e.g., Quality Control, Administrative Law Judges), submit questions directly to the Food Stamp Policy Implementation Unit or Employment and Special Projects Unit representative via e-mail.

1. RESPONSE NEEDED DUE TO: <input checked="" type="checkbox"/> Policy/Regulation Interpretation <input type="checkbox"/> QC <input type="checkbox"/> Fair Hearing <input type="checkbox"/> Immediate Need/Emergency Services <input type="checkbox"/> Other:	5. DATE OF REQUEST: 9/7/2010	NEED RESPONSE BY: When available
2. REQUESTOR NAME:	6. COUNTY/ORGANIZATION: Riverside County	
3. PHONE NO.:	7. SUBJECT: Clarification of PI	
4. REGULATION CITE(S): 44-316	8. REFERENCES: (Include ACL/ACIN, court cases, etc. in references) NOTE: All requests must have a regulation cite(s) and/or a reference(s). ACL 09-41	

9. QUESTION: (INCLUDE SCENARIO IF NEEDED FOR CLARITY):

RESPONSE TO CalWORKs COUNTY REQUEST FOR REGULATION INTERPRETATION

Subject: Report of a new job in the submit month Regulation Cite(s): 44-316

References: ACL 09-41 Date of Request: November 2, 2009

QUESTION:

Client's quarter is August September and October. September being the data month and October being the submit month. Client reports on the QR 7 received in October, the submit month, that she was just offered a job on October 3rd. This information was not known in the data month and is clearly stated so on the QR7.

10. REQUESTOR'S PROPOSED ANSWER:

11. FRAT RESPONSE TO COUNTY QUESTION:

12. STATE POLICY RESPONSE (FSPIU USE ONLY):

Yes. The above answer from CDSS is correct.

There are a couple of appropriate places to answer the questions on the QR7.

First, question 1b reads: If the income or money reported above WILL CHANGE in the next three months after the SUBMIT MONTH, please explain and attach proof.

So this would work, as the money and/or income is changing.

Also, question 9 reads: Have any of the following or any other changes happened to anyone in your home?

There is a specific box among the possibilities, labeled WORK (Started or stopped working, refused a job or training, number of hours

FOR FRAT USE

DATE RECEIVED:	DATE RESPONDED TO COUNTY: TA	DATE FORWARDED TO STATE:
----------------	---------------------------------	--------------------------

9. QUESTION: (INCLUDE SCENARIO IF NEEDED FOR CLARITY):

RESPONSE TO CalWORKs COUNTY REQUEST FOR REGULATION INTERPRETATION

Subject: Report of a new job in the submit month Regulation Cite(s): 44-316

References: ACL 09-41 Date of Request: November 2, 2009

QUESTION:

Client's quarter is August September and October. September being the data month and October being the submit month. Client reports on the QR 7 received in October, the submit month, that she was just offered a job on October 3rd. This information was not known in the data month and is clearly stated so on the QR7.

Do we use the anticipated income in the following quarter, November in this case? Or do we instruct the client to report it on her next QR 7 as the change did not occur in the data month?

CDSS RESPONSE:

A report in the submit month shall be treated as a voluntary mid-quarter report. In order to be considered part of the QR 7 information, and therefore, be considered a mandatory report, the client must have been aware of the new job in the data month. Since in this scenario, the client did not know about the new job until the submit month, this information will not be used to calculate the upcoming quarter's grant amount. As long as the new income does not go over the client's Income Reporting Threshold (IRT) then they do not have to report the new job or earnings until the following QR 7. MPP section 44-316.31(QR) explains how counties should treat mid-quarter voluntary reports and states that, if the grant would decrease based on the voluntary report, the county shall not take action to change the grant.

The policy expressed in this response is based on the unique set of facts presented and should not be presumed to apply to all other situations.

Response Issued Date: November 25, 2009

I received the attached PI regarding Income reported in the submit month and I need some clarification.

The PI states "in order to be considered part of the QR 7 information, and therefore, be considered a mandatory report, the client must have been aware of the new job in the data month." Should I take this to mean that if the customer was aware (in the data month) of the new job that would begin in the submit month it must be reported on the QR 7?

I ask because the QR 7 does not allow for a place for this type of reporting. Question 1 asks about income received in the data month. If the income has not been received yet (would begin in the submit month), then question 1a and 1b does not apply. Would this also apply to the Food Stamp program?

12. STATE POLICY RESPONSE (FSPIU USE ONLY):

Yes. The above answer from CDSS is correct.

There are a couple of appropriate places to answer the questions on the QR7.

First, question 1b reads: If the income or money reported above WILL CHANGE in the next three months after the SUBMIT MONTH, please explain and attach proof. So this would work, as the money and/or income is changing.

Also, question 9 reads: Have any of the following or any other changes happened to anyone in your home?

There is a specific box among the possibilities, labeled WORK (Started or stopped working, refused a job or training, number of hours worked or in training went up or down, or went out on strike?)

Under this question, there is a section to name the person, what happened, when, etc.

Either if these places would be the appropriate place for the client to report the change in employment.